

Defendants.

No. 2:22-cv-241

2. Defendants plan to file a motion to dismiss Plaintiffs' complaint by the April 10, 2023, deadline. Under Local Rule 7.2(c), Defendants' brief in support of their motion and Plaintiffs' brief in opposition thereto may not exceed 25 pages, and Defendants' reply may not exceed 10 pages. Defendants request an additional 15 pages for their opening motion in order to fully and adequately

address several potential grounds for dismissal, including threshold issues of standing for which Defendants believe the Court would benefit from a fuller discussion of the issues. Plaintiffs consent to this requested extension in exchange for an additional 15 pages to oppose Defendants' motion, and Plaintiffs also consent to an additional 10 pages for Defendants to reply.

3. Accordingly, Defendants request (with Plaintiffs' consent) that the Court increase the page limit for Defendants' forthcoming motion to dismiss from 25 pages to 40 pages, Plaintiffs' opposition thereto from 25 pages to 40 pages, and Defendants' Reply from 10 to 20 pages.

4. The parties also request an enlargement of time for Plaintiffs to respond to the Defendants' motion to dismiss by 14 days and for Defendants to file a Reply by 7 days. Under this revised schedule, Plaintiffs' deadline to respond to Defendants' forthcoming motion to dismiss would be extended to May 15, 2023, and Defendants' deadline to reply to Plaintiffs' opposition would be extended to June 5, 2023.

5. The parties thank the Court for its consideration of this request.

Dated: April 4, 2023

Respectfully submitted,

BRIAN M. BOYNTON
Principal Deputy Assistant Attorney General

ANTHONY J. COPPOLINO
Deputy Director

/s/ Samuel Rebo
SAMUEL REBO (DC Bar # 1780665)
Trial Attorney
United States Department of Justice
Civil Division, Federal Programs Branch
1100 L Street NW
Washington, DC 20005
(202) 514-6582
Samuel.a.rebo@usdoj.gov
Counsel for Defendant

CERTIFICATE OF SERVICE

I hereby certify that on April 4, 2023, I electronically filed this brief with the Clerk of the Court for the United States District Court for the Northern District of Texas by using the CM/ECF system. Counsel in the case are registered CM/ECF users and service will be accomplished by the CM/ECF system.

/s/ Samuel Rebo
SAMUEL REBO
U.S. Department of Justice

CERTIFICATE OF CONFERENCE

I certify that on April 4, 2023, undersigned counsel conferred with counsel for Plaintiffs regarding this motion pursuant to Local Civil Rule 7.1. Plaintiffs do not oppose Defendants' motion.

/s/ Samuel Rebo
SAMUEL REBO